

S. BRENT VOGEL
Nevada Bar No. 006858
Brent.Vogel@lewisbrisbois.com
ALAYNE M. OPIE
Nevada Bar No. 012623
Alayne.Opie@lewisbrisbois.com
LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
702.893.3383
FAX: 702.893.3789
*Attorneys for Defendant Narconon Fresh Start d/b/a
Rainbow Canyon Retreat ("Fresh Start")*

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

HARRY GEANACOPULOS, a Massachusetts Citizen; LAREN GEANACOPULOS, a Massachusetts Citizen; and, PETER GEANACOPULOS, a Massachusetts Citizen

Plaintiffs,

VS

NARCONON FRESH START d/b/a
RAINBOW CANYON RETREAT;
ASSOCIATION FOR BETTER LIVING
AND EDUCATION INTERNATIONAL;
NARCONON INTERNATIONAL; and,
DOES 1-100, ROE Corporations I-X, inclusive.

Defendants.

CASE NO. 2:14-cv-00629-JCM-NJK

STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER

**SUBMITTED IN COMPLIANCE WITH
LR 26-1(e)**

The parties, through their counsel, submit the following Stipulated Discovery Plan and Scheduling Order pursuant to the requirements of F.R.C.P. 26, F.R.C.P. 16(b) and LR 26-1.

F.R.C.P. 26(f) Conference

Pursuant to F.R.C.P. 26(f) and LR 26-1(d), a conference was held on July 25, 2014, between Plaintiffs' counsel, Ryan Hamilton of Hamilton Law; Fresh Start's counsel, Alayne Opie of Lewis Brisbois Bisgaard & Smith; and, Narconon International's ("NI") and Association for Better Living and Education International's ("ABLE") counsel, John Bemis of Hall Prangle & Schoonyeld, LLC.

1 **Discovery Cut-Off Date (LR 26-1(e)(1))**

2 The proposed last day of discovery shall be January 2, 2015, which is approximately 180 days
3 from the date (July 7, 2014) on which NI and ABLE filed its Motion to Dismiss Complaint (Doc. 13).

4 **Amendment of Pleadings and Adding of Parties (LR 26-1(e)(2))**

5 The parties shall have until October 3, 2014, to file any motion to amend the pleadings or to
6 add parties. This date is approximately 90 days prior to the close of discovery.

7 **F.R.C.P. 26(a)(2) Disclosures (Experts) (LR 26-1(e)(3))**

8 Disclosure of experts shall proceed according to F.R.C.P. 26(a)(2), except that, pursuant to LR
9 26-1(e)(3):

10 (A) Parties shall disclose their initial experts and expert reports by November 3, 2014,
11 which is approximately 60 days prior to the close of discovery; and
12 (B) Parties shall disclose their rebuttal experts and expert reports by December 3, 2014,
13 which is approximately 30 days after the parties' initial disclosure of experts.

14 **Dispositive Motions (LR 26-1(e)(4))**

15 The parties shall have until January 30, 2015, to file dispositive motions, which does not
16 exceed 30 days after the proposed discovery cut-off date.

17 **Joint Pretrial Order (LR 26-1(e)(5))**

18 The joint pretrial order shall be filed by February 27, 2015, which is not more than 30 days
19 after the date set for filing dispositive motions. If a dispositive motion is timely filed, this deadline is
20 suspended until 30 days after decision of the dispositive motions, or until further order of the Court.

21 **F.R.C.P. 26(a)(3) Disclosures (LR 26-1(e)(6))**

22 Unless otherwise directed by the Court, pretrial disclosures as set out in F.R.C.P. 26(a)(3) shall
23 be made at least 30 days before trial. Within 14 days thereafter, unless a different time is specified by
24 the Court, a party may serve and file a list disclosing objections as set out in F.R.C.P. 26(a)(3).

25 **Interim Status Report (LR 26-3)**

26 The parties' Interim Status Report is due on November 3, 2014, which is not later than 60
27 days before the discovery cut-off.

1 **Initial Disclosures**

2 The parties shall serve their initial disclosures, as required by F.R.C.P. 26(a)(1), by August 8,
3 2014.

4 **Discovery Plan**

5 The parties jointly propose to the Court the following discovery plan: all discovery allowed
6 under the Federal and Local Rules of Civil Procedure. The parties intend to take discovery regarding
7 liability and damages.

8 **Pre-Trial Conference**

9 The parties do not request a pre-trial conference with the Court before the entry of the
10 Scheduling Order.

11 **Settlement**

12 To be determined.

13 **Pretrial Disclosures**

14 Final lists of witnesses and exhibits required by F.R.C.P. 26(a)(3) shall be included in the joint
15 pretrial order. The parties shall have 14 days after service of final lists of witnesses and exhibits to file
16 objections under F.R.C.P. 26(a)(3).

17 **Later Appearing Parties**

18 A copy of this Discovery Plan and Scheduling Order shall be served within five days of an
19 appearance by any new party. This Discovery Plan and Scheduling Order shall apply to such later-
20 appearing parties, however the parties herein agree to stipulate to extend discovery deadlines should
21 there be good cause to do so if additional parties are added hereafter.

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1 **Extensions or Modifications of the Discovery Plan and Scheduling Order**

2 LR 26-4 governs modifications or extensions of this Discovery Plan and Scheduling Order.
3 Any stipulation or motion must be made no later than 21 days prior to the expiration of the subject
4 deadline.

5 DATED this 28th day of July, 2014

6 LEWIS BRISBOIS BISGAARD & SMITH LLP

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8 By _____ /s/ Alayne M. Opie

9 S. BRENT VOGEL

10 Nevada Bar No. 006858

11 ALAYNE M. OPIE

12 Nevada Bar No. 012623

13 6385 S. Rainbow Boulevard, Suite 600

14 Las Vegas, Nevada 89118

15 *Attorneys for Defendant Narconon Fresh Start d/b/a
Rainbow Canyon Retreat ("Fresh Start")*

16 DATED this 28th day of July, 2014

17 HAMILTON LAW

18 By _____ /s/ Ryan A. Hamilton

19 Ryan A. Hamilton

20 Nevada Bar No. 11587

21 5125 S. Durango Dr., Ste. C

22 Las Vegas, NV 89113

23 *Attorneys for Plaintiffs*

1 DATED this 28th day of July, 2014

2 HALL PRANGLE & SCHOONVELD, LLC

3

4 By _____ /s/ John Bemis

5 Kenneth M. Webster
6 Nevada Bar No. 7205
7 John F. Bemis
8 Nevada Bar No. 9509
9 1160 North Town Center Drive, Suite 200
10 Las Vegas, Nevada 89144
*Attorneys for Association for Better Living and Education
International ("ABLE") and Narconon International
("NI")*

11 IT IS SO ORDERED:

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14 UNITED STATES MAGISTRATE JUDGE
15 DATED: